REMARKS

Claims 1-30 were pending in the present application prior to this response. Claims 1-30 are rejected. Claims 1, 6-10, 15-17, 22-27 and 30 have been amended herein. Claims 2, 5 and 18 have been canceled. Reconsideration of the rejections of all claims is requested.

I. Objection to the Specification

The specification was objected to because it contained embedded hyperlinks and/or other forms of browser-executable code. The specification, as amended herein, does not contain any hyperlinks. Therefore, the objection has been overcome. The applicant notes that the specification does contain computer code. However, the computer code is used to describe the operation of the invention and is, therefore, proper.

II. Rejection of Claims 2, 5, and 15 Under 35 U.S.C. §112

Claims 2, 5, and 15 were rejected under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention.

The claims, as amended herein, overcome the rejections. The applicant notes that claim 2 has been cancelled herein.

Claim 15 was withdrawn from consideration by the examiner. The applicant traverses this withdrawal as there are no legal grounds for the withdrawal. Accordingly, claim 15 remains pending in the application. The applicant notes that claim 15 has been amended herein to overcome a dependency error.

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HP Docket No. 100200402-1   9

III.   **Rejection of Claims 1-4, 6, 11, 12, 17, and 22-30 Under 35 U.S.C. §102(e)**

Claims 1-4, 6, 11, 12, 17, and 22-30 were rejected under 35 U.S.C. §102(e) as being anticipated by Saulpaugh (U.S. 6,792,466).

Claim 1 has been amended to include the elements of claims 2 and 5. Claim 5 depended from claim 2 and claim 2 depended from claim 1. Claim 5 was rejected under 35 U.S.C. §103(a). Therefore, the rejections of all claims under 35 U.S.C. §102(e) that are dependent on claim 1 (3, 4, 11, and 12) are moot. The applicant notes that these claims will be addressed in reference to the rejections under 35 U.S.C. §103(a).

Claim 17 has been amended to include the elements of claim 18, which was also rejected under 35 U.S.C. §103(a). Therefore, the rejections under 35 U.S.C. §102(e) of claim 17 is moot. The rejection of claim 17 will be addressed in reference to the rejections under 35 U.S.C. §103(a).

CLAIM 22

Claim 22 is independent and is stated as follows for convenience:

A method for automatically generating source code for manipulating at least one mark-up language message comprising the steps of: receiving a schema definition for a mark-up language message; generating a first in-memory representation of the schema definition based on the schema definition; generating a second in-memory representation of source code based on the first in-memory representation of the schema definition; wherein the step of generating a second in-memory representation of source code based on the first in-memory representation of the schema definition includes performing one of context free processing and context sensitive processing.

HP Docket No. 100200402-1   10

According to the office action, Saulpaugh discloses "wherein the step of generating a second in-memory representation of source code based on the first in-memory representation of the schema definition includes performing one of context free processing and context sensitive processing" as claimed in claim 1. The applicant notes that the context processing is described in the present application at paragraphs 56, 62, and 77 of the printed application (page 19, lines 5-12; page 16, lines 8-16; and page 20, line 36 to page 21, line 5 of the filed application).

The office action states that the aforementioned element of claim 22 is disclosed in Saulpaugh at column 17, line 10. This section of Saulpaugh discloses generating code, but does not disclose "performing one of context free processing and context sensitive processing" as claimed in claim 22. More specifically, this section of Saulpaugh discloses that some code need not be downloaded, which does not relate to context free or context sensitive processing. Again, there is no disclosure related to "performing one of context free processing and context sensitive processing" as claimed in claim 22.

Based on the foregoing, Saulpaugh does not disclose all the elements of claim 22 and cannot anticipate claim 22.

CLAIMS 23-30

Claims 23-30 are dependent on claim 22 and are deemed allowable by way of their dependence and for other reasons. Based on the foregoing, the applicant requests reconsideration of the rejections.

IV.   Rejection of Claims 5, 13, 14, and 18-21 Under 35 U.S.C. §103(a)

Claims 5, 13, 14, and 18-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saulpaugh, as applied to claims 2, 17 above, and in further view of Hayes-Roth (U.S. 6,031,549).

HP Docket No. 100200402-1   11

CLAIM 5 (CLAIM 1)

As stated above, claim 1 has been amended to include the elements of claim 5. Claim 5 has been cancelled herein. Therefore, the rebuttal to the rejection of claim 5 is based on claim 1, which is stated as follows for convenience:

A method for automatically generating source code for manipulating at least one mark-up language message based on a mark-up message definition comprising:

receiving the mark-up language message definition;

generating a first in-memory representation of the message definition based on the received message definition;

generating a second in-memory representation of a source code based on the first in-memory representation of the message definition, said generating a second in memory representation comprising generating a schema object tree by employing a blackboard architecture that includes agents and solutions; wherein the schema object tree includes one or more nodes; and wherein the nodes of the schema object tree are agents and the nodes of the source object tree are the solutions; and

generating source files based on the second in-memory representation of the source code.

In the rejection of claim 5 (now claim 1), the office action combined Saulpaugh and Hayes-Roth as a basis for the rejection under 35 U.S.C. §103(a). The applicant respectfully argues that the combination is not proper. Saulpaugh is directed toward trusted construction of message endpoints in a distributed computing environment. Hayes-Roth, on the other hand, is directed toward improvisational behavior in a computer-controlled character which enables the character to reflect personality, mood, and other life-like qualities. These two references are not even closely similar.

HP Docket No. 100200402-1   12

As a motivation for the combination, the office action cites column 7, lines 25-50 of Saulpaugh. The office action also states that the motivation for the combination "would have been to provide a Blackboard Architecture for control and agents acting as nodes of the tree of Saulpaugh for improvising a course of behavior as defined by the XML Schema of Saulpaugh." The applicant notes that the section of Saulpaugh relied on by the office action has nothing to do with behavior in a computer-controlled character. Rather, the section of Saulpaugh relates to ergonomic keyboards and monitors used in thin mobile clients.

The applicant refers to MPEP §706.02(j), which states, in part:

> The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The teaching or suggestion to combine Saulpaugh and Hayes-Roth is not found in either reference. Therefore, the combination and the rejection are not proper. Based on the foregoing, the applicant requests reconsideration of the rejection.

In addition to the foregoing traversal of the rejection of claim 1, the applicant respectfully argues that all the limitations of the claim 1 are not disclosed by the cited art. According to the office action, the element of "generating a schema object tree by employing a blackboard architecture that includes agents and solutions" is disclosed by Hayes-Roth. The office action cites column 36, line 50 of Hayes-Roth as disclosing this element of claim 1. However, this section of Hayes-Roth only discloses titles of journal articles and does not teach anything. The office action also cites column 7, lines 25-50, which is simply a software overview and is not related to blackboard architecture. Thus, this element of claim 1 is not disclosed.

Based on the foregoing, the rejection of claim 1 has been overcome. The applicant requests reconsideration of the rejection.

HP Docket No. 100200402-1   13

CLAIMS 13 AND 14

Claims 13 and 14 are ultimately dependent on claim 1 and are deemed allowable by way of their dependence and for other reasons. Therefore, the applicant requests reconsideration of the rejections.

CLAIM 18 (CLAIM 17)

As stated above, claim 17 has been amended to include the elements of claim 18. Claim 18 has been cancelled herein. Therefore, the rebuttal to the rejection of claim 18 is based on claim 17, which is stated as follows for convenience:

A system for generating source code for manipulating at least one mark-up language message comprising: a first module for receiving a message definition and based thereon for generating a first in memory data structure that corresponds to the message definition, wherein the first data structure comprises a plurality of nodes; a second module for receiving the first data structure and based thereon for generating a second in memory data structure that corresponds to source code for manipulating at least one mark-up language message, wherein the second data structure comprises a plurality of nodes; a blackboard architecture, wherein the nodes of the first data structure are agents and the nodes of the second data structure are solutions.

Claim 18 was rejected on the same grounds as claim 5. Because claim 18 has been incorporated into claim 17, the applicant incorporates the rebuttal to the rejection of claim 5 (now claim 1) into this rebuttal. As set forth above, the combination of Hayes-Roth is not proper. In addition, the combination does not disclose all the elements of claim 17, such as the blackboard architecture.

Based on the foregoing, the rejection of claim 17 has been overcome.

HP Docket No. 100200402-1   14

CLAIMS 19-21

Claims 19-21 are dependent on claim 17 and are deemed allowable by way of their dependence and for other reasons. Therefore, the applicant requests reconsideration of the rejections.

V.   Rejection of Claims 7-10 and 16 Under 35 U.S.C. §103(a)

Claims 7-10 and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saulpaugh and Hayes as applied to claims 1 and 5, and further in view of Coden (U.S. 6,341,277).

Claims 7-10 and 16 are ultimately dependent on claim 1 and are deemed allowable by way of their dependence and for other reasons. In addition, the applicant reiterates the previous argument that the combination of Saulpaugh and Hayes is not proper.

Based on the foregoing, the applicant contends that the rejections have been overcome and requests reconsideration.

Respectfully submitted,

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Dated: March 28, 2005   By: _Robert W. Nelson signature_

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HP Docket No. 100200402-1   15